

REMARKS

Claims 1 and 3-15 are pending in this application. By this Amendment, claims 1 and 3-5 are amended and claim 8 is canceled.

Claims 3, 5, 10 and 12 stand rejected under 35 U.S.C. §102(b) over Funada, U.S. Patent No. 5,742,408. This rejection is respectfully traversed. Claims 3 and 5 have been amended to include the features that the image formed by the image forming apparatus is by printing, and that the copy forgery preventing image data includes at least a background portion constituted by a first pattern and a latent image portion constituted by a second pattern. As such, withdrawal of the 35 U.S.C. § 102(b) rejection of claims 3, 5, 10 and 12 is respectfully requested.

Claims 1, 4, 9 and 11 stand rejected under 35 U.S.C. §103(a) over Funada. This rejection is respectfully traversed. Claims 1 and 4 have been amended to include the feature that the selecting means selects the copy forgery preventing image data so that, when an image is formed by the specified image forming apparatus, the background portion and the latent image portion are almost equal in density. Accordingly, the 35 U.S.C. § 103(a) rejection of claims 1, 4, 9 and 11 is respectfully requested.

Claims 6, 7, 13 and 14 stand rejected under 35 U.S.C. §103(a) over Funada, in view of Heckman, U.S. Patent No. 5,291,243. This rejection is respectfully traversed. Funada does not teach or suggest "an image forming characteristic of the image forming apparatus corresponds to a resolution of the image forming apparatus." The support that is cited for this feature is one section of Funada which teaches that a print preventative pattern must be inconspicuous with human eyes (col. 8, lines 50-63) and another section which teaches that a selected pattern is specifically designed according to the resolution of the printer (col. 4, lines 5-13). Applicants respectfully disagree that these two sections can be properly combined as support for this particular claimed feature since the interpretation formed from the

combination of these statements contradicts other teachings found in Funada. More specifically, Funada teaches that the type of pattern added to copied documents is determined by the type of original being copied. If the image being copied is similar to a particular kinds of originals that should not be copied, such as securities, bank notes, confidential papers and the like, Funada teaches that the intensity of the added pattern is increased to make it visible (See col. 6, lines 6-22 and col. 9, lines 24-31). Funada further teaches that the pattern is weakened (so that it is not visible) or not even added to the other types of copied images. As such, the determination of the type of pattern (corresponding to the claimed "copy forgery preventing image data") added to copied image is based on the type of image being copied, not the resolution of the copier since the Funada system operates on the premise that both types of added patterns, visible and invisible, are within the resolution of the copier.

In contrast, the recited feature in the present claims directed to the resolution of the image forming apparatus pertains to the capability of all types of image forming apparatus such as printers, copiers, scanners etc. Certain types of image forming apparatus have very high resolutions with the capacity to print multiple colors while others have very low resolutions and are monochromatic. Because Applicants' claimed apparatus and methods are applicable to all types of image forming apparatus, the resolution of any particular apparatus is important when forming the copy forgery preventing image data.

Heckman discloses a system for printing security documents which have copy detection or tamper resistance including color patterns with oppositely varying density patterns of electronically generated pixel dot images with varying spaces in between. Heckman, however, fails to disclose a piece of copy forgery preventing image data corresponding to an *image forming characteristic* of an image forming apparatus, as recited in claims 1 and 3-7, and therefore, fails to make up for the deficiency of Funada.

Accordingly, neither Funada nor Heckman, individually or in combination, disclose or suggest a piece of copy forgery preventing image data corresponding to an image forming characteristic of an image forming apparatus, as recited in claims 1 and 3-7. In view of the above, withdrawal of the 35 U.S.C. § 103(a) rejection of claims 6, 7, 13 and 14 is respectfully requested.

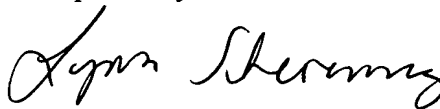
Claim 8 stands rejected under 35 U.S.C. §103(a) over Funada and Heckman. This rejection is respectfully traversed. For the reasons given above, Funada and Heckman do not teach or suggest "an image forming characteristic of the image forming apparatus corresponds to a resolution of the image forming apparatus." As such, withdrawal of this rejection is also requested.

Claim 15 stands rejected under 35 U.S.C. §103(a) over Funada and Barry, U.S. Patent No. 5,859,711. This rejection is respectfully traversed. Barry is being cited for the proposition that "using a plurality of image forming apparatuses for printing...to speed up the printing process" (see paragraph 8 of the Office Action). The speed of the image forming apparatus is not a claimed feature of the present claims. As such, the use of Barry for this proposition is flawed. Moreover, Funada does not teach or suggest "an image forming characteristic of the image forming apparatus corresponds to a resolution of the image forming apparatus." The addition of Barry does not cure this deficiency. Withdrawal of this §103(a) rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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